

THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

IN RE:

OKLAHOMA FORGE, LLC d/b/a  
OKLAHOMA FORGE, INC.,  
Debtor.

Bankruptcy No. 24-11060-M

Chapter 7

**AGREED REQUEST FOR CONVERSION TO CHAPTER 11**

Debtor, Oklahoma Forge, LLC d/b/a Oklahoma Forge, Inc. by Stipulation filed November 21, 2024 [Doc. 55] has consented to the entry of an order for relief under the Involuntary Petition [Dkt. 1] filed by Ellwood Quality Steels Company, Ellwood National Steel Company and Lehigh Specialty Melting, Inc. (collectively, “Petitioning Creditors”) on August 16, 2024, and joined by Metro Machine Works, Inc. on October 10, 2024 [Dkt. 27].

The Debtor, with the agreement of the Petitioning Creditors and Metro Machine Works, Inc. hereby requests this Court enter an instant order converting this case to a case under Chapter 11 pursuant to 11 U.S.C. § 706(a).

The undersigned counsel has communicated with counsel for the Petitioning Creditors and Metro Machine Works, Inc. and authorized to state that such parties agree to the relief requested herein.

Wherefore, Debtor prays this Court enter an instant order converting this case to a case under Chapter 11 pursuant to 11 U.S.C. § 706(a).

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**Attorney for Metro Machine Works, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that, on the 21 day of November, 2024, I served or caused to be served a true and correct copy of the foregoing Stipulation via electronic mail upon all parties receiving notice via the Court's CM/ECF notification system.

/s/ Mark A. Craige

Mark A. Craige